



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street  
New York, New York 10007*

April 22, 2022

**BY ECF**

Honorable Ronnie Abrams  
United States District Judge  
United States District Court  
40 Foley Square  
New York, NY 10007

Re: *ACLU v. FBI*, 21 Civ. 10719 (RA)

Dear Judge Abrams:

In accordance with the Court's March 22, 2022, Order, ECF No. 14, we write jointly on behalf of Defendant the Federal Bureau of Investigation ("FBI") and Plaintiff the American Civil Liberties Union ("ACLU") to update the Court on the status of the parties' discussions on a schedule for the search, processing, and production of responsive records in the instant matter.

As the Parties advised in their prior status letter, the FBI has completed its search for documents potentially responsive to Plaintiff's Freedom of Information Act ("FOIA") request. Since the parties' last letter, the FBI has completed further review and is now able to provide a preliminary page count of potentially responsive records. At this time, the FBI estimates that there are approximately 1,500 pages of potentially responsive records. The FBI will review documents at a rate of approximately 500 pages per month, and will produce any responsive, non-exempt documents, or portions thereof, on a rolling basis. The FBI anticipates making its first production by May 31, 2022. Barring any unforeseen circumstances, the FBI anticipates completing its processing by the end of July.

The parties do not believe that a court conference is necessary at this time, and can provide a further status update to the Court within sixty days.

Respectfully submitted,

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*Counsel for Plaintiff*

The Court thanks the parties for the status update. The parties shall provide another update within 60 days and indicate whether they believe a conference is necessary at that time.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'RA', followed by a horizontal line.

Hon. Ronnie Abrams  
4/25/22